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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEONID ISAAKOVICH TEYF,

Defendant.

Case No. 2:19CR00394-RJS-DBP

MOTION FOR ORDER
OF FORFEITURE

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

Pursuant to Fed R. Crim. P. Rule 32.2(b), the United States of America respectfully submits this Motion for Order of Forfeiture. In support of this motion, the government states:

1. On July 21, 2022, an Amended Felony Information was entered with the court charging Leonid Isaakovich Teyf with Misprision of Wire Fraud Conspiracy Felony, in violation of 18 U.S.C. § 4, (Count 1).

2. The Court's jurisdiction in this matter is founded in 28 U.S.C. § 1355. The United States sought forfeiture pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c).

3. On September 21, 2022, the defendant pleaded guilty to Misprision of a Conspiracy to Commit Wire Fraud Felony (Count 1 of the Amended Felony Information). As a result of the plea of guilty the defendant must forfeit to the United States all property, acquired from or traceable to the offenses and all property that was used to facilitate the offenses, in violation of 18 U.S.C. § 4, including, but not limited to, the following specific property:

Companies

- Any and all interest in A&Y Transportation Inc.
- Any and all interest in A&B Transportation Inc.
- Any and all interest in Costa Transportation, Inc.
- Any and all interest in Eugene Trucking Inc.
- Any and all interest in American Star Transport Inc.
- Any and all interest in Big Dogs Transport Inc.
- Any and all interest in Fusion Transport, Inc.
- Any and all interest in Falanga Transport Inc.
- Any and all interest in BTF Logistics, Inc.
- Any and all interest in Salt Lake Trucking Group, LLC
- Any and all interest in Salt Lake Diesel Repair Inc.
- Any and all interest in Salt Lake Driving Academy, Inc.
- Any and all interest in Salt Lake Commercial Properties, LLC, to include any and all past due rent payments possibly owed to me from SLCP and/or Jonathan "Kirk" Glancy and/or his associated trucking businesses that he has continued to operate out of 5745 West 300 South since October of 2019.

Funds Seized from America First Credit Union

- \$4,259.34 seized from 0421-3.1 in the name of A&B Transportation, Inc.
- \$7,506.97 seized from 0421-3.9 in the name of A&B Transportation, Inc.
- \$803.80 seized from 7165-9.1 in the name of A&Y Transportation, Inc.
- \$7,607.20 seized from 7165-9.9 in the name of A&Y Transportation, Inc.
- \$2,556.02 seized from 8112-1.1 in the name of American Star Transport, Inc.
- \$7,211.45 seized from 8112-1.9 in the name of American Star Transport, Inc.
- \$2,305.88 seized from 7748-9.1 in the name of Costa Transportation, Inc.
- \$14,291.38 seized from 7748-9.9 in the name of Costa Transportation, Inc.
- \$671.71 seized from 8126-1.1 in the name of Eugene Trucking, Inc.
- \$2,843.47 seized from 8126-1.9 in the name of Eugene Trucking, Inc.
- \$4,520.96 seized from 8125-3.1 in the name of Falanga Transport, Inc.
- \$8,981.81 seized from 8125-3.9 in the name of Falanga Transport, Inc.
- \$64,165.93 seized from 3320.9 in the name of Salt Lake Diesel Repair
- \$54,164.94 seized from 6920.9 in the name of Salt Lake Driving Academy
- \$294,379.15 seized from 2231.9 in the name of Salt Lake Trucking Group
- \$1,769.62 seized from 5371-8.9 in the name of Big Dogs Transport, Inc.
- \$7,849.46 seized from 5371-8.1 in the name of Big Dogs Transport, Inc.
- \$9,168.85 seized from 6625-6.9 in the name of Fusion Transport, Inc.
- \$7,588.29 seized from 6625-6.1 in the name of Fusion Transport, Inc.
- \$54,164.94 seized from 6625-6.1 in the name of Salt Lake Driving Academy, Inc.

Proceeds from Sale of Vehicle

- \$12,226.00 representing proceeds from the sale of a 2016 BMW/R1200 GS Adventure, VIN: WB10A1205GZ666693, registered in the name of A&B Transportation

Funds Seized from America First Credit Union

- \$233,425.41 in funds from AFCU Bank Account #3187077-7.9 in the name of Leonid Teyf.

Property Interest

- Any and all interests I may have in our former business location previously identified as the Salt Lake Trucking Group building located at 5743 West 300 South, Salt Lake City, Utah.

. Promissory Notes

- The United States agrees to release any claims it may have to two promissory notes between the defendant and Salt Lake Commercial Properties in the amounts of \$1,000,000.00 and \$900,000.00.

4. Forfeiture of the above-identified property pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c), is appropriate based on the evidence presented in the Amended Felony Information and the Statement in Advance of Plea. The United States has established the requisite nexus between the property and the offenses.

5. In accordance with the provisions of Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States requests that it be permitted to undertake whatever discovery is necessary to identify, locate, or dispose of property subject to forfeiture and/or substitute property.

6. After discovery of any specific substitute asset, the United States will move, pursuant to Fed. R. Crim. P. 32.2(e) for an amended order of criminal forfeiture for the specific substitute asset. Upon entry of such an order, the United States will provide notice of the order

allowing third parties who claim an interest in any such asset to petition the court for a hearing to adjudicate the validity of their interest in the asset, pursuant to 21 U.S.C. § 853.

7. The United States requests pursuant to Fed. R. Crim. P. 32.2(b)(2)(B) “to allow the parties to suggest revisions or modifications before the order becomes final as to the defendant under Rule 32.2(b)(4).” We also request that the court reference the forfeiture order in its judgment. Fed. R. Crim. P. 32.2(b)(4)(B).

WHEREFORE, the United States respectfully requests that this Court enter an Order of Forfeiture, forfeiting to the United States the property described herein and in the Amended Felony Information and order the Federal Bureau of Investigations to maintain custody of the forfeited property in accordance with the law.

Dated this 23rd day of September, 2022.

TRINA A. HIGGINS
United States Attorney

/s/ Cy H. Castle
CY H. CASTLE
Assistant U.S. Attorney